

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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July 7, 2020

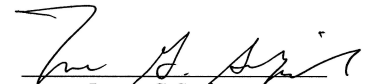
VIA ECF

The Honorable Lorna Schofield  
United States District Judge - Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Dujohn Willette, 19 CR 196

Dear Judge Schofield:

For substantially the same reasons stated in the Government's opposition letter at docket number 48, this application is DENIED. The Clerk of the Court is directed to terminate the letter motion at docket number 47.  
Dated: July 8, 2020  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

With the consent of Pretrial Services, I write to seek a modification to the conditions of Mr. Willette's release so that he can escort his common-law wife home from Jacobi Hospital following her glaucoma surgery this Friday, July 10th. If approved, Mr. Willette will provide medical documentation to his Pretrial Officer confirming his wife's surgery and her need for an escort, and a taxi/uber receipt as proof of his travel to and from the hospital.

On March 31, 2020, following the parties' joint application, Mr. Willette was released from the MDC subject to bail conditions, including home incarceration. Mr. Willette was (and is) awaiting sentencing and, at the time of his release, already served the bottom-end of the advisory Guidelines range as calculated by the Probation Department. Furthermore, because of underlying medical issues, Mr. Willette was identified as a high-risk individual should he contract COVID-19.

Pretrial Services informs me that Mr. Willette has been fully compliant with the conditions of his release and consents to this application. The government objects. I attach a copy of AUSA Sassoon's email to me outlining her objections.

Thank you and I hope you and your chambers are remaining safe and well.

Respectfully submitted,

Julia Gatto, Assistant Federal Defender  
Tel: (212) 417-8750

cc: AUSAs Danielle Sassoon/Benjamin Schrier (via ECF)

Re: dujohn willette

Sassoon, Danielle (USANYS) <Danielle.Sassoon@usdoj.gov>

Tue 7/7/2020 1:13 PM

To: Julia Gatto <Julia\_Gatto@fd.org>;

Cc: Schrier, Benjamin (USANYS) <Benjamin.Schrier@usdoj.gov>;

Julia,

As an initial matter, I think it is misleading to describe this woman to us and to pretrial as his wife.

But beyond that, I do not consent to this request. But for COVID and his medical condition, Willette would be detained. The rationale for releasing him was for him to protect his health and quarantine. That rationale is undermined if he leaves his house and enters a hospital. And if that's the position you take, we will likely reconsider our position on his current bail.

I spoke to his pretrial services officer - now that she has more full information she is evaluating her position and gave me permission to tell you that her final position hasn't been decided yet.

Best,  
Danielle

On Jul 7, 2020, at 11:21 AM, Julia Gatto <Julia\_Gatto@fd.org> wrote:

Common law.

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**From:** Sassoon, Danielle (USANYS) <danielle.sassoon@usdoj.gov>  
**Sent:** Tuesday, July 7, 2020 10:54 AM  
**To:** Julia Gatto; Schrier, Benjamin (USANYS)  
**Subject:** RE: dujohn willette

I was not aware that he is married. Since when is he married/is this a girlfriend/common law wife? That information is relevant to my assessment of the request.

Thanks,  
Danielle

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**From:** Julia Gatto <Julia\_Gatto@fd.org>  
**Sent:** Tuesday, July 7, 2020 10:47 AM  
**To:** Sassoon, Danielle (USANYS) <DSassoon@usa.doj.gov>; Schrier, Benjamin (USANYS) <BSchrier@usa.doj.gov>  
**Subject:** Fw: dujohn willette

Hey guys, I hope you and your families are still doing ok.

With pretrial consents, I intend to make a bail mod for Mr. Willette so he can accompany his wife to and from her glaucoma surgery this Friday at Jacobi Hospital in the Bronx. Can I represent you consent?

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**From:** Ashley Cosme <Ashley\_Cosme@nyspt.uscourts.gov>  
**Sent:** Tuesday, July 7, 2020 10:13 AM  
**To:** Julia Gatto  
**Cc:** Izlia Sanchez  
**Subject:** RE: dujohn willette

Hi Julia,

Thank you, I hope you're doing well also.

Yes, Mr. Willette told me about the procedure. Pretrial does not object to this request. The defendant remains in compliance with all conditions.

Ashley L. Cosme  
Intensive Supervision Officer  
U.S. Pretrial Services, SDNY  
(212) 805-4319  
<image001.jpg>

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**From:** Julia Gatto <Julia\_Gatto@fd.org>  
**Sent:** Tuesday, July 7, 2020 10:00 AM  
**Cc:** Ashley Cosme <Ashley\_Cosme@nyspt.uscourts.gov>  
**Subject:** Re: dujohn willette

Hey Ashley, I hope you are still managing ok and everyone in your family is safe and sound.

I plan on putting in an application to permit Dujohn Willette to leave his home Friday, 7/10 from 9am to 5 pm to take his wife to Jacobi Hospital in the Bronx where she is having glaucoma surgery. Can I represent you consent? Thanks.

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**From:** Joshua Rothman <Joshua\_Rothman@nyspt.uscourts.gov>  
**Sent:** Tuesday, July 7, 2020 9:56:56 AM  
**To:** Julia Gatto  
**Cc:** Ashley Cosme  
**Subject:** RE: dujohn willette

Hi Julia,

Ashley Cosme is supervising him.

Josh Rothman  
Intensive Supervision Specialist  
U.S. Pretrial Services  
Southern District of New York  
212-805-4339

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**From:** Julia Gatto <Julia\_Gatto@fd.org>  
**Sent:** Tuesday, July 7, 2020 9:33 AM  
**To:** Joshua Rothman <Joshua\_Rothman@nyspt.uscourts.gov>  
**Subject:** dujohn willette

are you is pretrial officer? if not, do you know how I find out who is supervising him. thanks!